



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Parminder Singh
DOCKET NO.: 20-26597.001-R-1 through 20-26597.005-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Parminder Singh, the appellant(s), by attorney Ryan Schaeffges, of the Law Office of Ryan Schaeffges, P.C. in Wheeling; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

| DOCKET NO | PARCEL NUMBER | LAND | IMPRVMT | TOTAL |
|------------------|----------------------|-------------|----------------|--------------|
| 20-26597.001-R-1 | 02-17-308-033-0000 | 6,661 | 17,640 | \$24,301 |
| 20-26597.002-R-1 | 02-17-308-034-0000 | 2,463 | 0 | \$2,463 |
| 20-26597.003-R-1 | 02-17-308-035-0000 | 1,905 | 0 | \$1,905 |
| 20-26597.004-R-1 | 02-17-308-052-0000 | 5,505 | 0 | \$5,505 |
| 20-26597.005-R-1 | 02-17-308-053-0000 | 20,002 | 0 | \$20,002 |

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

Appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2020 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of five property identification numbers (PINs) and only one PIN with an improvement. The improvement consists of a 77-year-old, one-story, single-family dwelling of masonry construction with 1,225 square feet of living area. The property has a 38,067 square foot site and is located in Inverness, Palatine Township, Cook County. The property is a class 2 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant contends overvaluation as the basis of the appeal. In support of its overvaluation argument, appellant submitted evidence disclosing the subject property was purchased on May 2,

2018, for a price of \$235,000. In Section IV of the appeal form, appellant indicates the subject property sold by owner and was advertised for sale, and the parties to the transaction were not family members or related corporations. Appellant submitted a copy of the ALTA Settlement Statement reflecting a purchase price of \$193,000 on May 01, 2018. Appellant also submitted a land contract dated May 16, 2014, reflecting a sale price of \$235,000 for the subject property. In its brief, appellant indicates the subject property was transferred via contract in an arm's length transaction in 2014 but the sale was not finalized until 2018 at which time an appraisal was conducted. Appellant further indicates that the purchase price for all 7 acres of the subject property was \$235,000, at which time the property was appraised again. Appellant contends the Board mistakenly said in its decision that the appraisal did not consider the additional land. In addition, appellant also submitted a copy of the board of review's written decision reflecting the subject property was assessed at a total of \$54,176.

In further support of this argument, appellant submitted an appraisal estimating the subject property had a market value of \$285,000 as of March 6, 2018. The appraisal report indicates the appraiser inspected the subject property and undertook the Sales Comparison Approach analyzing three sales comparables and making any appropriate adjustments in determining the market value of the subject property. Based on this evidence, appellant requests the subject property's total assessment be reduced to \$28,500.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$24,301. The subject's assessment reflects a market value of \$243,010, or \$198.38 per square foot of living area, including land, when applying the level of assessments for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted three comparable sales properties. The comparable properties were improved with a one-story, single-family dwelling of either frame or frame and masonry construction, with living square foot area between 1,288 and 1,777. They sold between July 2017 and January 2020 for prices ranging between \$284.64 to \$415.30 per square foot of living area, including land.

In addition, the board of review submitted a memorandum arguing that the appellant's request for \$1 assessments for two PINS would equate to a zero tax bill and is therefore a de facto exemption from taxation which the Board is excluded by statute from doing. Considering appellant's installment contract initiated in 2014, the board of review contends the lots are not worthless and do have value.

Pursuant to proper notice provided to all parties, this matter was set for hearing for January 16, 2024. Prior to hearing, the parties agreed to have the matter written on the evidence previously submitted and the hearing was canceled.

Conclusion of Law

Appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market

value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds appellant *did not meet* this burden of proof and a reduction in the subject's assessment *is not* warranted.

The Board finds the best evidence of market value to be the board of review's comparables #1 and #2 and comparable sale #1 from the appraisal report submitted by the appellant. The best comparables sold between February 2018 and January 2020 for prices ranging between \$157.26 to \$295.44 per square foot of living area, including land. The sales dates of the best comparables were closest in time the lien year at issue in the instant appeal.

The land contract submitted by appellant is dated 2014, is too far removed from the lien date at issue in the instant appeal to adequately reflect the market value of the subject property as of the relevant tax year. While the 2018 sale of the subject property is closer in time to the tax year at issue in the instant appeal, it does not definitively reflect a purchase price for all five PINs of the subject property.

Similarly, sale comparables #2 and #3 in the appraisal report submitted by appellant have sales dates far removed from the lien year at issue in the instant appeal and it is unclear why the report did not include more recent sales which were in close proximity to the subject property, such as the board of review's comparables #1 and #2. For this reason, the credibility of the appraiser's conclusion is undermined. The subject's current assessment of \$198.38 per square foot of living area, including land, reflects a market value within the market value range established by the best comparables in this record. Based on this record, the Board finds appellant *has not* proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment *is not* warranted.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date:

May 21, 2024



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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